CONTEMPORARY
SOCIOLOGY
A Journal of Reviews
July 1995 Volume 24, Number 4

The scale and permanence of international migration are rendering assumptions about formal equality among the members of the postindustrial societies of Europe and North America increasingly problematic. Once upon a time, the institution of national citizenship—"invented" by the French Revolution, as Brubaker (1992) puts it—appeared to have settled the issue. Immigrants seemed but a messy if temporary exception, perhaps especially to Americans, since the second and subsequent generations in the United States are American citizens by birth. But what is one to make of nations such as Switzerland, where currently one of every six residents is not a citizen, or Germany, where one of every 12 is not, and where alien status is inherited by each new generation?

Limits of Citizenship: Migrants and Postnational Membership in Europe, by **Yasemin Nuhoğlu Soysal.** Chicago, IL: University of Chicago Press. 244 pp. $37.50 cloth. ISBN: 0-226-76841-4. $13.25 paper. ISBN: 0-226-76842-3.

Ausländer—Aussiedler—Asyl: Eine Bestandsaufnahme, by **Klaus J. Bade.** München: C. H. Beck, 1994. 287 pp. NPL. paper. ISBN: 3-406-37462-X.

One take on this situation is provided by Yasemin Soysal's important and challenging book, *Limits of Citizenship*, which argues that the significance of citizenship is declining in the immigration societies of the West. Soysal's argument takes its point of departure from a series of interlocking legal, institutional, and ideological changes affecting the situations of immigrants and other foreigners in the countries of Western Europe. (Her study covers Britain, France, Germany, the Netherlands, Sweden, and Switzerland, and often singles out Turkish immigrants for particular attention, but she clearly intends it to have broader application.) These countries welcomed, indeed encouraged, a variety of migrations in the period following World War II as a solution to what were viewed as temporary labor shortages. But despite increasing restrictiveness towards immigration and a few determined attempts to promote return migrations, they have found that "guest" workers have turned into more or less permanent residents—the immigrants and their descendants, have "regularized" their situations, without generally becoming citizens.

Central to her argument is the claim that the legal and institutional distinctions between citizens and aliens are eroding. Using a variety of documentary sources and interviews with state officials, Soysal builds her case that foreigners have acquired many of the rights previously reserved for citizens, such as full access to social security systems. She argues that this decline in distance between citizen and foreigner has resulted from the overlaying of the discourse of human rights granted or implied by international agreements and institutions, such as the European Union and the European Court of Human Rights, onto nationally specific citizenship frameworks, stretching them well beyond their previous boundaries. As a result, a "postnational model of membership," associated with a valorization of "universal personhood" in place of "nationhood," is emerging. But national states remain the sites where the postnational model must be implemented, producing tensions and paradoxes.

A key concept in her account is that of "incorporation," the inclusion of immigrants in the polities of their host societies. This incorporation is something she attempts to demonstrate by showing that European states have established a variety of mechanisms through which the interests and viewpoints of aliens can be taken into account. Incorporation, however, is not a uniform process but occurs in a nationally specific fashion, determined in large part by pre-existing models of political participation. Soysal highlights the differences among corporatist Sweden, where immigrants are represented by corporate groups in national forums; statist France, where the national state dominates with little mediating structure interposed between its machinery and individual foreigners; and liberal Britain, where incorporation is largely left to voluntary associations operating at the local level. The critical case of Germany is something of a mixture, combining features of the corporatist and statist models.

Soysal maintains that the extension to aliens of rights previously reserved for citizens has followed a distinctive path in contemporary societies, reversing a key sequence in the well-known model elaborated by T. H. Marshall on the basis of the British experience. According to Marshall, civil and political rights provided the opening for social rights. However, in contemporary immigration societies, social and civil rights have come first, since, in Soysal's words, "host states find it much harder to deny social and civil rights—those directly linked to the person, such as individual liberties and a minimum standard of living—to new groups of people, even if they do not belong to the formal national polity" (p. 131). Political rights, especially participation in national elections, continue to be the province of citizens. Even voting in local elections has been incompletely granted (although implementation of the Maastricht agreement will grant such rights to citizens of European Union states, which may in turn increase pressures to grant voting rights to other immigrants).

Soysal's analysis challenges most recent discussions of immigration, which take as axiomatic the fundamental importance of the legal and social distinctions between citizens and aliens. For example, Brubaker's widely respected examination of the historical evolution of the different French and German concepts of citizenship attribution presumes from the start that citizenship "is a powerful instrument of social closure" (Brubaker, 1992: x). But the limits to Soysal's work must be noted. Her analysis takes as its materials institutional templates, the formal descriptions of institutions and their functioning, as well as discourses, the conceptual modalities used by international organizations, national states, and immigrant organizations to address issues in this domain. As she forthrightly admits, she does not examine institutional practices. Nor does her analysis reflect the social inequalities that may exist between citizens and immigrants in most immigration societies—inequalities that are anchored in the discriminatory practices of institutions in such realms as housing, schools, and labor markets as well as in the attitudes of many citizens towards the foreigners in their midst (for the case of Germany, see Alba et al. 1994). It is hard to avoid the impression that Soysal presses her case too far and projects the legal privileges of immigrants beyond a more modest social reality.

A quite different take on the citizen–foreigner cleavage is provided by Klaus Bade's book, whose title means literally, "Foreigners—Out-settlers—Asylum: A stock-taking," and refers to the legally distinct modes of immigration into Germany. (The term "out-settlers," the ungainly but generally accepted translation of "Aussiedler," refers to Eastern Europeans with demonstrable German ancestry who are entitled to immediate citizenship under German law.) The German case is particularly intriguing because the heavy ethnic accents in German citizenship law suggest that the distinction between citizen and foreigner ought to carry special weight here, and also because Germany contains by a good measure the largest foreign population of any Western European country.

The author is as interesting as the book in this case. Bade, a prolific and engaged historian who is an expert on the migrations of the Imperial era, is the leading public intellectual on questions of immigration in Germany, and the book under review continues his efforts to make the case that Germany should recognize itself as a country of immigration and reformulate its laws and policies accordingly. These are currently fixed on the basis of a national self-identity, enshrined in the official guidelines for naturalization and repeatedly restated by the German government and prominent politicians of the center-right, that Germany is not an immigration country (in German, the mantra-like formula runs, *"Deutschland ist kein Einwanderungsland"*). Thus, Bade's book is more a brief intended to influence public debate than a scholarly treatise. It continues work that he began most prominently by organizing the 1994 manifesto on immigration signed by 60 prominent intellectuals (Bade, 1994a). But his contribution through scholarship has also been noteworthy, exemplified in the comprehensive reference work he has edited on German emigration and immigration since the Middle Ages (Bade, 1992). A brief sketch of his views on the current German scene has also appeared in English, in the journal *Daedalus* (Bade, 1994b).

The book under review features the sort of oxymoron favored in public debate, such as "an immigration situation without an immigration country" (*"Einwanderungssituation ohne Einwanderungsland"*) and "Germans with a foreign passport" (*"Deutsche mit einem fremden Paß"*), the latter a reference to the German-born children and grandchildren of immigrants. But the book is also a highly useful guide to those interested in contemporary ethnic divisions in Germany. It provides as compact and comprehensive a summary as one can find anywhere of the legal basis and historical development of the main forms of immigration to Germany, with particular attention to the political debate and legal changes since the late 1980s. It gives in addition an overview of data about the social and economic integration of foreigners, along with nearly 50 pages of footnotes with references to the literature.

Among the focal points of current debate in Germany discussed by Bade is reform of the citizenship law to make it easier for aliens, especially of the second and third generations, to become citizens. As is well known (see Brubaker 1992), German law represents virtually an ideal type of citizenship determined by ancestry (the so-called *jus sanguinis* principle, whereby citizenship is inherited from parents); little consideration is given to birthplace (the *jus soli* principle, found in American law). Hence, the paradox arises of second- and third-generation Turks and others who, born and educated in Germany, are more at home in German society than in that of their homeland but are not German citizens and can, in principle, be deported (though, in practice, deportation is rare). For reasons peculiar to the situation of Turks, the largest foreign group in Germany, the debate currently turns on the question of dual-nationality citizenship, i.e., naturalization without the surrender of any previous citizenship.

Bade discusses the disadvantages inherent in alien status in Germany. His emphasis is on the exclusion of foreigners from German society implied by citizenship law and on the attitudes of rejection the law both fosters and reflects; he discusses in some detail the violence directed against foreigners as an expression of this rejection. Others, it should be added, have suggested how the uncertainties inherent in the legal position of aliens may contribute to the social disadvantages of immigrant groups. For instance, the prospects for the school success of many immigrant children are thought to be undercut by parental beliefs that they must be prepared for the possibility of eventual return to their homelands (e.g., Schiffauer 1991). A further disadvantage, one that presents a significant point of contrast with the American experience, is that the second and third generations are barred as noncitizens from the civil service, an especially privileged sector of the labor force in Germany. There are, for instance, few police officers whose ethnic backgrounds match those in the immigrant communities. (Imagine how different would be the histories of many American ethnic groups if the same barrier had existed in the United States!) The danger in the German situation that emerges clearly from Bade's account is that of creating an ethnic underclass lacking the political voice of citizens.

These two books demarcate a polarity that is likely to remain with us for some time in interpreting the long-run ramifications of contemporary international migration. At one pole, to put the issue boldly, is the possibility raised by Soysal's account that the distinction between citizen and alien is changing in a way that represents an extension of the equality inaugurated by the French Revolution; at the other, the possibility that the growing presence of legally disadvantaged, ethnically distinct noncitizens in immigration societies can be seen as a modern resurrection of the *ancien régime*.

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ARISTIDE R. ZOLBERG
Department of Political Science
New School for Social Research